

Exhibit B

Jennifer Doran

11:22 AM (5 hours
ago)

to Leslie, me

Good morning,

Please see below in red for our response to your open records request:

Any communications between your office and any member of the Georgia Secretary of State's Office concerning an audit of the Dominion machines following the November 3, 2020 General election. **See PDF attached titled ORR09082022.**

Any communications between your office and PRO V&V concerning an audit of the Dominion machines following the November 3, 2020 General election. **No responsive documents in existence.**

Any records of audits or tests performed by PRO V&V in Morgan County from November 3, 2020 to date. **No responsive documents in existence.**

Thank you,

Jennifer Doran
Elections Director
Morgan County Board of Elections and Registration
237 North 2nd Street
Madison GA 30650
(706) 343-6311 office
jdoran@morgancountyga.gov

Jennifer Doran

From: Barnes, Michael <mbarnes@sos.ga.gov>
Sent: Friday, November 13, 2020 10:02 AM
To: Jennifer Doran
Subject: Pro V&V

Jennifer,

Representatives from Pro V&V will be arriving shortly to perform a field audit of equipment on behalf of the Secretary of State's office. These individuals will need access to a random selection of your voting equipment for only a few minutes.

The people who will be arriving around 11:15. The four people arriving are:

Jack Cobb
Ryan Wilson
Hunter Medlock
Michael Walker

Michael Barnes

Director – Center for Election Systems
Georgia Secretary of State
Main: 470-312-2630
Cell: 470-316-2884



Georgia Open Records Act: Under Georgia law, all information, including e-mail, written letters, documents and phone messages, sent to the County Board of Commissioners and County offices and employees is subject to Public Records law. This includes the sender's e-mail address, home address or phone number if shown in the message, the content of the message and any associated attachments to the mail.

From: R Coov <coov07@gmail.com>
Sent: Wednesday, September 7, 2022 5:21 PM
To: Jennifer Doran <jdoran@morgancountyga.gov>
Cc: Robert Covert <coov07@gmail.com>
Subject: ORR

Hi, I have an Open Records Request, I am requesting the following records:

Any communications between your office and any member of the Georgia Secretary of State's Office concerning an audit of the Dominion machines following the November 3, 2020 General election.

Any communications between your office and PRO V&V concerning an audit of the Dominion machines following the November 3, 2020 General election.

Any records of audits or tests performed by PRO V&V in Morgan County from November 3, 2020 to date.

Thank you so much,

Robert Covert

619 Oakledge Dr

Marietta, GA 30060

815-212-0675

Coov07@gmail.com

Exhibit A 01

 Deidre Holden <deidre.holden@paulding.gov>

10:40 AM (5 hours
ago)

to me

Mr. Coovert:

Thank you for your request. Paulding County has no emails or responsive documents pertaining to your requests. We did not have an audit of the machines following the November 2020 election. We have no communications with the SOS, Dominion or PRO V&V.

Please consider your request fulfilled.

Thank you,

“A great leader knows the way, shows the way, and goes the way...lead by example.” Unknown

Deidre B. Holden

**Director
Elections & Registration
Campaign Finance Filing Officer
Open Records Officer
Paulding County**

**240 Constitution Blvd.
Dallas, GA 30132**

**770-443-7503 Office
770-443-7548 Fax
678-306-7367 Cell**

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

NOTICE: This communication originates from the Paulding County Elections and Voter Registration Department, and it may contain privileged or other confidential information. If you are not the intended recipient, or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Also, please indicate to the sender that you have received this communication in error, and delete the copy you received.

From: R Coov <coov07@gmail.com>
Sent: Wednesday, September 07, 2022 5:24 PM
To: Deidre Holden <deidre.holden@paulding.gov>
Cc: Robert Coovert <coov07@gmail.com>
Subject: ORR

Hi, I have an Open Records Request, I am requesting the following records:

Any communications between your office and any member of the Georgia Secretary of State's Office concerning an audit of the Dominion machines following the November 3, 2020 General election.

Any communications between your office and PRO V&V concerning an audit of the Dominion machines following the November 3, 2020 General election.

Any records of audits or tests performed by PRO V&V in Paulding County from November 3, 2020 to date.

Thank you so much,

Robert Coovert

619 Oakledge Dr

Marietta, GA 30060

815-212-0675

Exhibit A 02

Records Request: Douglas County, Georgia

Inbox

Aubrey Britt <abritt@douglascountyga.gov>

1:16 PM (3 hours
ago)

to me

The Douglas County Board of Elections found no records responsive to your September 7, 2022 open records request related to communications between the Secretary of State's Office and the Board of Elections and Voter Registration concerning an audit of the Dominion machines following the November 3, 2020 General Election.

No communication was identified between the Board of Elections and Voter Registration and PRO V&V concerning an audit of the Dominion machines following the November 3, 2020 General Election.

There were also no records of audits or tests performed by PRO V&V in Douglas County from November 3, 2020 to the present. Thanks!

Aubrey Britt

Records Administrator

D: 770-920-7287

E : abritt@douglascountyga.gov

8700 Hospital Dr

Douglasville, GA 30134

Exhibit A 03

SCOTT M. SMITH, PC
JULE W. PEEK, JR., PC
VIRGINIA B. HARMAN
ROBERT T. MONROE
C. ANDREW GARNER III, PC
JASON B. SANKER, PC
W. JORDAN KNIGHT, PC
BRIAN R. BOJO, PC
CAREY L. PILGRIM
*JOHN F. LEE NIEDRACH, PC
CHRISTOPHER R. JACKSON, PC
LINTON S. JOHNSON
*-BENJAMIN P. STELL
STERLING C. NEWTON, III
MICHAEL D. MCRAE (OF COUNSEL)
JO H. STEGALL, III (1958-2014)
*LICENSED IN TENNESSEE
*-LICENSED IN ALABAMA

**PLEASE REPLY TO
ROME OFFICE**

SENDER'S E-MAIL:
VHARMAN@MSP-LAWFIRM.COM



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Harman & Monroe, LLP
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ROME OFFICE:

111 BRIDGEPOINT PLAZA, STE 300
ROME, GEORGIA 30161
(706) 291-6223
TOLL FREE: (888) 291-6223
FACSIMILE: (706) 291-7429
LAW@MSP-LAWFIRM.COM
MAILING ADDRESS:
P. O. Box 29
ROME, GA 30162-0029

CEDARTOWN OFFICE:

223 S. COLLEGE STREET
CEDARTOWN, GA 30125
(770) 749-6723
FACSIMILE: (770) 749-6729
MAILING ADDRESS:
P. O. Box 418
CEDARTOWN, GA 30125

September 12, 2022

VIA EMAIL c00v07@gmail.com

Robert Coovert
619 Oakledge Drive
Marietta, Ga 30060

Re: Open Records Request submitted September 7, 2022 @ 4:54pm.

Dear Mr. Coovert:

As County Attorney for Floyd County, I am contacting you on behalf of Floyd County regarding your open records act request dated September 7, 2022. I have checked with our Elections Supervisor, and we have no relationship with Pro V&V. Further, our elections office has only conducted one audit as that term is defined by statute and the SEB rules and that is the risk limiting audit performed by all counties following the 2020 general election.

Can you clarify that you are requesting email or other communication related to that 2020 audit? If you are requesting all email communications, I am certain that the process to retrieve those emails and review and redact them per the Georgia Open records act will cause costs in excess of \$25. It will likely be \$250-\$300. Please confirm that you are willing to be responsible for the costs.

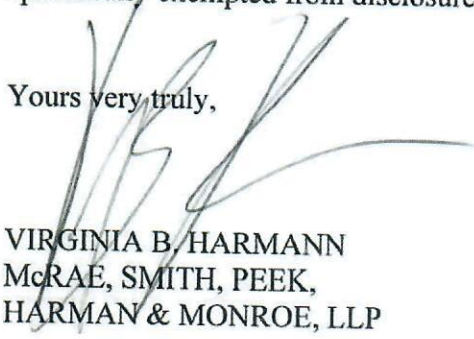
Further, to the extent that the response will require input from elections staff, at this time, our very limited number of staff members are required to give priority to duties related to the 2022 General Election. Due to the tremendous number of open records act requests Floyd County is receiving regarding elections matters, it is impossible to determine when staff will be able to give attention to those requests and it may be after the November Election before many of them can be addressed.

Coover
ORR 09.12.2022
Page 2 of 2

Staff will be attempting to review open records act requests in the order they are received unless a request is very limited and/or redundant of previous requests so that a response can be completed in less than 15 minutes. Staff will give attention to these requests whenever their duties necessary for the 2022 General Election allow. When staff can review your request and give a more detailed estimate of costs and a date upon which they can expect to be able to complete the response, you will be notified.

Please be advised that OCGA 50-18-71(a) provides that "[a]ll public records shall be open for personal inspection and copying, except those which by order of a court of this state or by law are specifically exempted from disclosure."

Yours very truly,



VIRGINIA B. HARMANN
McRAE, SMITH, PEEK,
HARMAN & MONROE, LLP

VBH/te

c: Amy Dawkins (via email)



R Coov <coov07@gmail.com>

Fwd: Pro V&V

2 messages

Kevin Moncla <kmoncla@gmail.com>
To: R Coov <coov07@gmail.com>

Wed, Oct 12, 2022 at 6:59 PM

----- Forwarded message -----

From: **Eveler, Janine** <Janine.Eveler@cobbcounty.org>
Date: Mon, Jan 10, 2022 at 9:45 AM
Subject: RE: Pro V&V
To: Kevin Moncla <kmoncla@gmail.com>

The Center for Election Systems did an audit at one point. I don't know if they contracted with a vendor to assist with that or not.

Janine Eveler

Director,

Cobb County Elections & Registration

770-528-2312

770-528-2519 Fax

678-315-0439 Cell

www.CobbElections.org

Register...then Vote!

From: Kevin Moncla [mailto:kmoncla@gmail.com]
Sent: Friday, January 7, 2022 6:55 PM
To: Eveler, Janine <Janine.Eveler@cobbcounty.org>
Subject: Pro V&V

Ms. Janine,

Did Pro V&V ever do a forensic audit or review of your machines after the 2020 general election?

Thank you!

Kevin

CAUTION: This email originated outside Cobb County Government. Please exercise caution when opening links/attachments in this email .

R Coov <coov07@gmail.com>
To: Kevin Moncla <kmoncla@gmail.com>

Wed, Oct 12, 2022 at 10:58 PM

Thanks Kevin
[Quoted text hidden]

Exhibit A 04

Spalding County

Elections Supervisor: Kimberly Slaughter

Robert Covert had a call with Spalding County Elections Supervisor, Kimberly Slaughter on 9/12/22. Robert Covert also spoke to a Spalding County election's technician on 9/11/22.

Question asked by Mr. Covert: Is there any communications between your office and any member of the Georgia Secretary of State's Office concerning an audit of the Dominion machines following the November 3, 2020 General election.

Answer by Elections Supervisor: Ms. Slaughter did state that she started after the November 2020 elections but she has not seen or heard of any communications associated with Pro V&V or this audit. The election tech who was there during the 2020 election did state that he was not aware of any audit conducted on the voting machines by Pro V&V.

Any communications between your office and PRO V&V concerning an audit of the Dominion machines following the November 3, 2020 General election.

No

Any records of audits or tests performed by PRO V&V in Spaulding County from November 3, 2020 to date.

No

9/14/22, 1:27 PM

Gmail - Fwd: GASOS ORR #21-842 Additional Documents



R Coov <coov07@gmail.com>

Fwd: GASOS ORR #21-842 Additional Documents

2 messages

Kevin Moncla <kmoncla@gmail.com>
To: R Coov <coov07@gmail.com>

Mon, Sep 12, 2022 at 4:23 PM

----- Forwarded message -----

From: **ORR Administration** <openrecords@sos.ga.gov>
Date: Thu, Oct 28, 2021 at 12:48 PM
Subject: GASOS ORR #21-842 Additional Documents
To: Kevin Moncla <kmoncla@gmail.com>

Good Afternoon,

The Secretary of State has diligently searched and we have provided all of the documents that we have. Let me know if I can do anything else for you.

Kindest Regards,

Stephany Sheriff

Open Records Request Officer

Georgia Secretary of State

Phone: 4705839100



From: Kevin Moncla <kmoncla@gmail.com>
Sent: Wednesday, October 27, 2021 4:02 PM
To: ORR Administration <openrecords@sos.ga.gov>
Subject: Re: GASOS ORR #21-842 Additional Documents

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

9/14/22, 1:27 PM

Gmail - Fwd: GASOS ORR #21-842 Additional Documents

Thank you for the documents returned in response to my ORR; however, I have not received the specific images requested which are specifically detailed in the field audit report below. Can you please advise if they exist and if so please provide:

3.2 Audit Configuration

An ICX was selected at random from the warehouse in each county. The team member then photographed the seals and the device. All seals that needed to be removed were then removed. After all photographs were taken, the team member inserted a clean USB drive from Pro V&V into left hand access compartment. Next the team member then plugged in the unit and powered it on. At the prompt the team member inserted a Tech Key smart card and selected the option to "Extract Application". The team member then verified the SHA-256 generated by the unit and photographed the popup screen. The team then took the USB drive containing the exported application to a Pro V&V laptop to compare the SHA-256 hash values to the known value from previous testing.

An ICP was selected at random from the warehouse in each county. The team member then photographed the seals and the device. All seals that needed to be removed were then removed. After all photographs were taken, the team member removed any compact flash cards under county supervision and inserted two compact flash cards (one blank and the other containing techextract.enc that was created by Pro V&V during certification testing). The unit was plugged in and powered on. A password was entered and a tech iButton was then read by the ICP and the option to "Extract Firmware" was selected. The compact flash cards, if present, were returned to the same ICP. The team member then took the compact flash card containing the exported firmware to a Pro V&V laptop to compare the SHA-256 hash values to the known value from previous testing.

An ICC was selected at random in each county central office if there were multiple units. The team member then photographed the device. The county provided the credentials to login to the workstation. The Pro V&V team member navigated to the ICC folder on the root of the workstation and copied all application files onto a Pro V&V USB drive. The team member then took the USB drive containing the exported firmware to a Pro V&V laptop to compare the SHA-256 hash values to the known value from previous testing.

Thank you,

Kevin Moncla

On Wed, Oct 27, 2021 at 7:30 AM ORR Administration <openrecords@sos.ga.gov> wrote:

Good Morning,

The attached is the rest of the documents the Secretary of State has that are responsive to your request. Redactions are made only to the extent authorized by law. Pursuant to state law, such confidential or exempt information found in the responsive records will be redacted, including, but not limited to, the following: individuals' day and month of birth; unlisted telephone number; personal email address; personal cellular telephone number; social security number; driver's license number; financial information; health information; information that (if disclosed) would compromise election security; records of election cases pending investigation; communications subject to attorney-client privilege; and attorney-work product. See O.C.G.A. § 50-18-72(a)(1)-(4), (20) (A), (21), (25)(A), (34), (41), (42), and (44); O.C.G.A. § 21-2-225; and O.C.G.A. § 21-2-379.24.

Kindest Regards,

9/14/22, 1:27 PM

Gmail - Fwd: GASOS ORR #21-842 Additional Documents

R Coov <coov07@gmail.com>

To: Kevin Moncla <kmoncla@gmail.com>

Wed, Sep 14, 2022 at 1:26 PM

It's amazing Kevin... that's a process or procedure, nothing there is auditable.

Bob

[Quoted text hidden]